

August 16, 2019

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

**Via SCPSC E-FILING DMS**

**Re: Dominion Energy South Carolina, Incorporated's Request for Approval of an Expanded Portfolio of Demand Side Management Programs, and a Modified Demand Side Management Rate Rider;**

**Docket No. 2019-239-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission a copy of the Petition to Intervene of Walmart Inc., in the above-referenced case. By copy of this letter, I am serving all parties of record via electronic mail and/or first-class mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton  
(SC Bar No. 80073)

Carrie Harris Grundman  
[charris@spilmanlaw.com](mailto:charris@spilmanlaw.com)

Derrick Price Williamson  
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*Counsel to Walmart Inc.*

SUE/sds  
Attachments  
c: Certificate of Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-239-E

IN RE: Dominion Energy South Carolina,	)	<b>PETITION TO INTERVENE OF</b>
Incorporated's Request for Approval of an	)	<b>WALMART INC.</b>
Expanded Portfolio of Demand Side	)	
Management Programs, and a Modified	)	
Demand Side Management Rate Rider	)	

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Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On June 28, 2019, Dominion Energy South Carolina, Inc. ("DESC" or "Company") filed a request for approval of an expanded Demand Side Management Plan and a modified Demand Side Management Rate Rider ("Request"), pursuant to S.C. Code Ann. § 58-37-20 (2015, as amended) and Public Service Commission of South Carolina Regulation 10 S.C. Code Ann. Regs. 103-819, 103-823 (2012), and in compliance with Commission Order No. 2010-472, as affirmed and modified by Order No. 2013-826.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10<sup>th</sup> Street, Bentonville, AR 72716-0550.

3. Walmart has the privilege of providing its retail services throughout the State of South Carolina, operating 128 facilities, including 84 Supercenters, four Distribution Centers, 27

Neighborhood Markets, and 13 Sam's Clubs.<sup>1</sup> Within DESC's service territory, Walmart is a large commercial customer, purchasing approximately 140 million kWh annually, and operating 34 retail stores and facilities, including Walmart Supercenters, Sam's Clubs, and gas stations, and a distribution center. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DESC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and energy efficiency ("EE") and therefore is very interested in this case and has participated in similar cases in the past. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DESC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

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 Carrie Harris Grundmann  
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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Grundmann be added jointly to the service list. Walmart may cause to be filed a motion for Mr. Williamson and Ms. Grundmann to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of

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<sup>1</sup> <https://corporate.walmart.com/our-story/our-locations#/united-states/south-carolina>

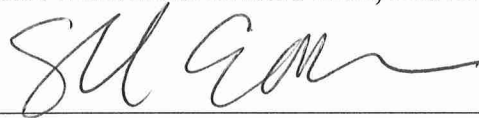
such request, Walmart requests that Mr. Williamson and Ms. Grundmann be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

**WHEREFORE**, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

**SPILMAN THOMAS & BATTLE, PLLC**

By



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*Counsel to Walmart Inc.*

Dated: August 16, 2019



BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-239-E

IN RE: Dominion Energy South Carolina,	)	<b>CERTIFICATE OF SERVICE</b>
Incorporated's Request for Approval of an	)	
Expanded Portfolio of Demand Side	)	
Management Programs, and a Modified	)	
Demand Side Management Rate Rider	)	

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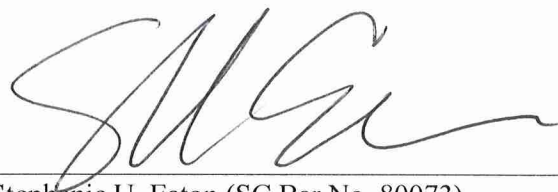
I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via electronic mail and/or first-class mail:

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Dated: August 16, 2019